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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NILDA GUTIERREZ, LINDA MORGAN,
WAYNE BROWN and KRISTA
MARSHALL,

Plaintiffs,

v.

JOHNSON & JOHNSON,

Defendant.

Civil Action No. 01-5302(WHW)

**NOTICE OF MOTION FOR SUMMARY
JUDGMENT DISMISSING CLAIMS OF
PLAINTIFF LINDA MORGAN**

PLEASE TAKE NOTICE that on July 8, 2010, at 10:00 a.m., or such other date and time
that might be set by the Court, defendant, Johnson & Johnson, will move under Rule 56 of the

Federal Rules of Civil Procedure for summary judgment dismissing the claims of plaintiff Linda Morgan in their entirety, with prejudice. This motion is being filed pursuant to the provisions of the Seventh Amended Scheduling Order and Case Management Plan as amended by the proposed Thirteenth Amended Scheduling Order and Case Management Plan as jointly submitted by the parties.

Please take further notice that in support of this motion, defendant relies on (1) Brief in Support of Defendant's Motions for Summary Judgment, (2) Rule 56.1 Statement of Undisputed Material Facts Addressing Claims of Plaintiff Linda Morgan and the evidentiary materials attached thereto, (3) Certification of Stephen F. Payerle in Support of Motions for Summary Judgment, and (4) proposed form of Order served and filed herewith.

/s/ Francis X. Dee

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Counsel for Defendant
Johnson & Johnson

Dated: March 15, 2010

CERTIFICATE OF SERVICE

I certify that a copy of the within Notice of Motion and the supporting materials referenced in this notice are being served on counsel for plaintiff this date by e-mail and by Federal Express.

I certify under penalty of perjury that the foregoing statement by me is true.

A handwritten signature in black ink, appearing to be 'SR' or similar, written above a horizontal line.

Dated: March 15, 2010